

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

STACY ERNST, DAWN HOARD, IRENE  
RES-PULLANO, MICHELLE LAHALIH,  
and KATHERINE KEAN,

*Plaintiffs,*

v.

CITY OF CHICAGO,

*Defendant.*

Case No.: 08 C 4370

Judge Charles R. Norgle, Sr.

Magistrate Judge Jeffrey Cole

**CITY OF CHICAGO’S MOTION FOR AN EXTENSION OF TIME TO RESPOND TO  
PLAINTIFFS’ PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Defendant, the City of Chicago (the “City”), by its undersigned attorneys, moves for an extension of time to respond to Plaintiffs’ Proposed Findings of Fact and Conclusions of Law.

In support of its motion, the City states:

1. On January 29, 2015, the Plaintiffs filed their Proposed Findings of Fact and Conclusions of Law (“Findings”), consisting of 97 pages and more than 260 paragraphs (Dkt. No. 561.) On the same date, the City filed its Proposed Findings of Fact and Conclusions of Law, consisting of 51 pages. (Dkt. No. 558.)

2. Due to the length of Plaintiffs’ Findings, as well as other pressing litigation matters, the City requires an extension of 15 days, from February 5, 2015 to February 20, 2015, to respond to Plaintiffs’ Findings.

3. In particular, two of the City’s principal trial counsel, Mr. Kennedy and Mr. Donham, are participating in a preliminary injunction hearing before the Honorable Rita Novak in the related cases of *Jones v. Municipal Employees Annuity & Benefit Fund of Chicago*, Case

No. 14 CH 20027 (Cook County, Ill.) and *Johnson v. Municipal Employees Annuity & Benefit Fund of Chicago*, Case No. 2014 CH 20668 (Cook County, Ill.), each of which involve a constitutional challenge to P.A. 98-0641, the 2014 Illinois Pension Reform Bill.

4. In addition, Mr. Donham this week is preparing for and defending the deposition of an expert witness in *Chicago Teachers Union v. Board of Education of the City of Chicago*, Case No. 12 CV 10311 (N.D. Ill.) (Ellis, J.).

5. In light of these pressing matters as well as the length of Plaintiffs' Findings, the City requires an additional 15 days from the current due date of February 5, 2015, to respond.

6. This motion is not brought for purposes of delay.

WHEREFORE, the City of Chicago prays that this Court grant its Motion, grant it until February 20, 2015 to respond to Plaintiffs' Proposed Findings of Fact and Conclusions of Law, and grant such other and further relief as the Court deems just.

Dated: February 4, 2015

Respectfully submitted,

**THE CITY OF CHICAGO**

Respectfully submitted,

**STEPHEN R. PATTON,**  
Corporation Counsel of  
the City of Chicago

s/ Cary E. Donham

By: s/ Steven R. Patton

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